

DEC 18 1990



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500

DENVER, COLORADO 80202-2405

DEC 18 1990

Ref: 8HWM-FF

Mr. Gary Baughman, Unit Leader
Hazardous Waste Facilities
Hazardous Materials and Waste Management Division
Colorado Department of Health
4210 East 11th Avenue
Denver, CO 80220-3716

Dear Mr. Baughman:

Please find enclosed EPA and EPA contractor comments pertaining to the Plan for Prevention of Contaminant Dispersion (PPCD), Draft 1.0, submitted September 21, 1990. These comments are submitted to you as lead regulatory agency for your review and use in evaluating this plan submitted by DOE. We have forwarded a copy of these comments to DOE.

The PPCD as presented is unacceptable. The PPCD as presented is a plan for a plan and presents no firm commitment from DOE to prevent contaminants from being dispersed. It should be a plan predicated on information already generated through the completion of the vast modelling exercises presently proposed within the PPCD. As presented, it anticipates completion of the modelling work in parallel with RFI/RI work. Thus it does not support the RFI/RI field work. The plan proposes no timeframe for completion of the modelling work, so that it becomes impossible to determine what response activities the PPCD will support. The plan does not explain how the modelling work will be used to modify the preliminarily proposed techniques to mitigate contaminant dispersion. The plan does not narrow the focus of DOE's efforts to mitigate dispersion of contaminants and in fact the modelling exercises are defined only to determine the risk to off-site receptors. The plan does not commit DOE to actual procedures or criteria invoking mitigating procedures. The plan is deficient.

If you should have any questions regarding our comments on this document, please contact Martin Hestmark of my staff at (303) 294-1134.

Sincerely,

A handwritten signature in cursive script that reads "Lou Johnson".

Louis W. Johnson, Chief
Federal Facilities Remedial Branch

ADMIN RECORD

SW-000456

cc with Enclosure:

Robert M. Nelson, DOE
Frazer Lockhart, DOE
Tom Greengard, EG&G
Joe Palomba, CDH-RFP
Martin Hestmark, 8HWM-FF
Peter Ornstein, 8RC